

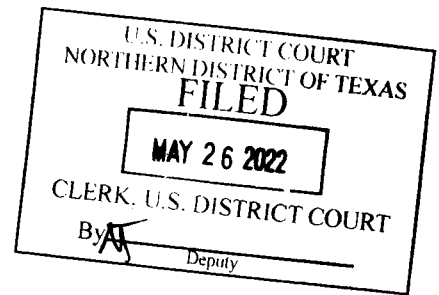
IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

UNITED STATES OF AMERICA

v.

ERFAN SALMANZADEH

No. 2:21-CR-066-Z
(Supersedes indictment
returned on 8/26/2021)



SUPERSEDING INDICTMENT

The Grand Jury Charges:

Count One

Making and Possessing an Unregistered Destructive Device
(Violation of 26 U.S.C. §§ 5861(d), 5861(f), and 5871)

On or about July 26, 2021, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Erfan Salmanzadeh**, defendant, knowingly made and possessed a firearm, as that term is defined in 26 U.S.C. § 5845(f), that was, and could readily have been put in, operating condition, that is, a destructive device, not registered to him in the National Firearms Registration and Transfer Record, defendant knowing the characteristics of said firearm.

In violation of Title 26, United States Code, Sections 5861(d), 5861(f), and 5871.

Count Two

Making and Possessing an Unregistered Destructive Device
(Violation of 26 U.S.C. §§ 5861(d), 5861(f), and 5871)

On or about July 26, 2021, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Erfan Salmanzadeh**, defendant, knowingly made and possessed a firearm, as that term is defined in 26 U.S.C. § 5845(f), that was, and could readily have been put in, operating condition, that is, a destructive device, not registered to him in the National Firearms Registration and Transfer Record, defendant knowing the characteristics of said firearm.

In violation of Title 26, United States Code, Sections 5861(d), 5861(f), and 5871.

Count Three

Making and Possessing an Unregistered Destructive Device
(Violation of 26 U.S.C. §§ 5861(d), 5861(f), and 5871)

On or about July 26, 2021, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Erfan Salmanzadeh**, defendant, knowingly made and possessed a firearm, as that term is defined in 26 U.S.C. § 5845(f), that was, and could readily have been put in, operating condition, that is, a destructive device, not registered to him in the National Firearms Registration and Transfer Record, defendant knowing the characteristics of said firearm.

In violation of Title 26, United States Code, Sections 5861(d), 5861(f), and 5871.

Count Four

Use and Attempted Use of a Weapon of Mass Destruction
(Violation of 18 U.S.C. § 2332a(a)(2))

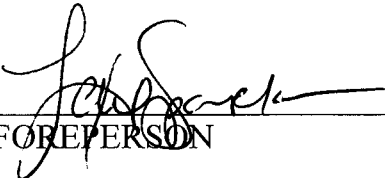
From on or about a date unknown to the grand jury, and continuing through on or about July 26, 2021, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Erfan Salmanzadeh**, defendant, acting without lawful authority, did unlawfully, knowingly, and intentionally use and attempt to use a weapon of mass destruction, as defined in 18 U.S.C. § 2332a(c)(2)(A), that is, a destructive device, as defined in section 921 of Title 18, meaning an explosive bomb and similar device, against any person and property within the United States and; the mail and a facility of interstate and foreign commerce was used in furtherance of the offense; such property was used in interstate and foreign commerce and in an activity that affects interstate and foreign commerce; and the offense, and the results of the offense, if it succeeded, would have affected interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 2332a(a)(2)(A), (B), and (D).

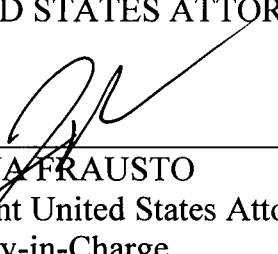
Forfeiture Notice
(26 U.S.C. § 5872)

Upon conviction of any offense alleged in this indictment and pursuant to 26 U.S.C. § 5872, defendant **Erfan Salmanzadeh** shall forfeit to the United States of America any firearm and ammunition involved in or used in the knowing commission of the offense including, but not limited to, three destructive devices and all components, accessories, and other materials used to make those devices.

A TRUE BILL:


FOREPERSON

CHAD E. MEACHAM
UNITED STATES ATTORNEY


JOSHUA FRAUSTO
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

THE UNITED STATES OF AMERICA

v.

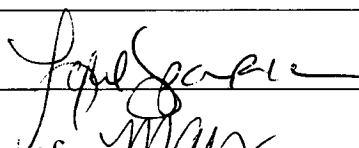
ERFAN SALMANZADEH

SUPERSEDING INDICTMENT

COUNTS 1-3: MAKING AND POSSESSING AN UNREGISTERED
DESTRUCTIVE DEVICE
Title 26, United States Code, Sections 5861(d), 5861(f), and
5871.

COUNT 4: USE AND ATTEMPTED USE OF A WEAPON OF MASS
DESTRUCTION
Title 18, United States Code, Section 2332a(a)(2).
FORFEITURE NOTICE
(4 COUNTS)

A true bill rendered:
Amarillo

 Foreperson

Filed in open court this 26th day of May, A.D. 2022.

Clerk

DEFENDANT IN FEDERAL CUSTODY


UNITED STATES MAGISTRATE JUDGE